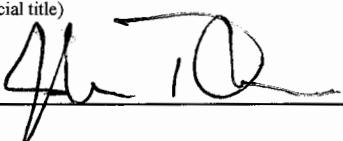
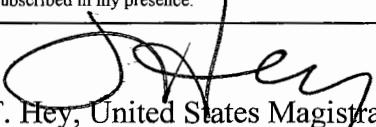


<b>United States District Court</b>		DISTRICT <b>Eastern District of Pennsylvania</b>
UNITED STATES OF AMERICA v. <b>JERMAINE JOHNSON</b>		DOCKET NO.
		MAGISTRATE'S CASE NO.  <i>16-1530</i>
Complaint for violation of Title 18 United States Code § 1951		
NAME OF JUDGE OR MAGISTRATE  <b>Honorable Elizabeth T. Hey</b>		OFFICIAL TITLE  <b>U.S. Magistrate Judge</b>
DATE OF OFFENSE August 17, 2016	PLACE OF OFFENSE Philadelphia, PA	ADDRESS OF ACCUSED (if known) Philadelphia, PA
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:  On or about August 17, 2016, JERMAINE JOHNSON did knowingly and unlawfully, by force and violence, and by intimidation, take, and aided and abetted the taking from another, that is employees of ZALES Jewelry store, located at 1777 Franklin Mills Circle, Philadelphia, Pennsylvania, and as a result of his actions, interstate commerce, or any item moving in interstate commerce, was delayed, obstructed, or affected.		
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:  <b>SEE AFFIDAVIT ATTACHED HERETO.</b>		
MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED:		
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT (official title)  <b>JOSEPH DONAHUE</b>  OFFICIAL TITLE  <b>Special Agent, Federal Bureau of Investigation</b>
Sworn to before me and subscribed in my presence.		
SIGNATURE OF MAGISTRATE <sup>(1)</sup>   <b>Honorable Elizabeth T. Hey, United States Magistrate Judge</b>		DATE  <i>12/20/16</i>

1) See Federal Rules of Criminal Procedure rules 3 and 54.

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, JOSEPH DONAHUE, Special Agent, Federal Bureau of Investigation (FBI), being duly sworn, state the following:

1. I have been employed with the FBI since September 20, 2015, and am currently assigned to the Philadelphia Division. Since February 22, 2016, I have been assigned to the Violent Crime Task Force (VCTF) as a Special Agent. My current duties include, among other things, the investigation of bank robberies, fugitives, and Hobbs Act robberies in violation of Title 18, United States Code, § 1951. Prior to my duties as a Special Agent with the FBI, I was a sworn police officer in the Town of Northborough in the Commonwealth of Massachusetts from January 2013 until August 2015.
2. I submit this affidavit in support of the arrest warrant and criminal complaint charging that JERMAINE JOHNSON (JOHNSON) committed Hobbs Act robbery.
3. This affidavit is based upon information I have gained from my investigation, my training and experience, as well as information received from others, including law enforcement officers. I have not included every fact known to me concerning this investigation, and, instead, I have submitted only those facts and circumstances that I believe establish probable cause to support the issuance of an arrest warrant and criminal complaint for JOHNSON.
4. On August 17, 2016, at approximately 10:26 AM, three male subjects entered the Zales Diamond Store at 1777 Franklin Mills Circle, Philadelphia, PA. They walked straight to a display case containing diamond rings and smashed the glass stealing approximately \$200,000 in merchandise. As soon as the subjects began the robbery, J. D., a victim employee, pressed a panic alarm, hid behind a counter, and screamed for help until the subjects left.
5. The robbery at Zales on August 17, 2016, was just one of a number of robberies and

thefts targeting high end clothing stores and jewelry stores. In each of the involved cases, multiple subjects would smash jewelry display counters or rip expensive jackets from security racks and run out of the store to a stolen parked car. On at least two occasions, investigators were able to determine a vehicle registration from video surveillance or witness reporting. Those vehicles were found to be stolen, and not long after the robberies and thefts, were set ablaze in North Philadelphia.

6. Investigators learned of a car theft on November 6, 2016 at approximately 9:26 PM at Faulkner Infiniti of Willow Grove where two vehicles were stolen off the lot after business hours. One of those vehicles was an Infinity QX56 bearing Pennsylvania registration DA059J. The same vehicle was used in a theft at Macy's in Moorestown, New Jersey, on November 13, 2016 as seen in video surveillance.

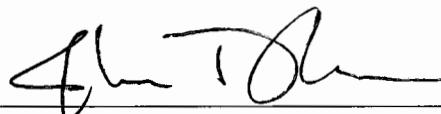
7. On November 15, 2016, Johnson was arrested in Philadelphia and charged with receiving stolen property after he was observed in the stolen Infinity QX 56.

8. Following his arraignment, JOHNSON met with investigators and, after waiving his Miranda rights, admitted his role in the Zales jewelry store robbery. JOHNSON told investigators that he was the driver and was operating a stolen Acura RDX. He parked the car next to the J.C. Penney as the others entered the store and smashed the glass on the display cases with hammers, filled their bags with stolen merchandise and fled the scene. JOHNSON's account is consistent with police reports, victim accounts, and witness accounts.

9. The investigation revealed that at the time of the robbery, Zales engaged in interstate business and had over 100 locations nationwide. Zales headquarters is based in Irving, Texas.

10. WHEREFORE, based upon the facts set forth in this affidavit, my personal knowledge, and training and experience, I have probable cause to believe, and do so believe, that

JERMAINE JOHNSON robbed the Zales Jewelry Store at 1777 Franklin Mills Circle, Philadelphia, PA, on August 17, 2016, in violation of Title 18, United States Code, § 1951.

  
\_\_\_\_\_  
JOSEPH DONAHUE  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this 20<sup>th</sup> day  
of December, 2016

  
\_\_\_\_\_  
HONORABLE ELIZABETH T. HEY  
United States Magistrate Judge